

UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA ,)	
)	
Plaintiff,)	
)	
)	No. 08 CR 36
)	
MHDE ASKAR,)	
)	
Defendant.)	

MOTION TO EXPAND CONDITION OF PRE-TRIAL RELEASE

Now comes your Defendant MHDE ASKAR by and through his attorney, Michael F. Clancy and Terence Gillespie and in support of his motion states;

1. That on January 22, 2008 the Defendant was granted Pre-trial Release under several conditions including Home Detention.
2. That also on January 22, 2008 the Court ordered that the Defendant tender a financial discloser to the Pre-trial office by January 18, 2008 which the Defendant complied with.
3. The Court when ordering this financial discloser indicated once it was tendered the Defendant's conditions of bond would be expanded and home detention removed.
4. The Defendant has been in complete compliance with all Conditions of Pre-trial release since January 22, 2008.
5. Home detention is not necessary to assure the Defendant's appearance in Court or protect society.

Wherefore, your Defendant respectfully requests this Honorable Court Expand the Defendant's Condition of Pre-trial Release and remove the Home Detention.

Respectfully submitted,

/s/Michael F. Clancy
Attorney for Mhde Askar

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